

IN RE:	PETER JAMES RYNARD and	:	CHAPTER 13
	SAMANTHA LEE RYNARD,	:	
	Debtors	:	
		:	
	JACK N. ZAHAROPOULOS,	:	
	STANDING CHAPTER 13 TRUSTEE,	:	
	Movant	:	
		:	
	vs.	:	
		:	
	PETER JAMES RYNARD and	:	
	SAMANTHA LEE RYNARD,	:	
	Respondents	:	CASE NO. 1-24-bk-02504-HWV

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Mountain Rock Road, Newville, PA.

WHEREFORE, the Trustee alleges and avers that the Debtors' Plan cannot be confirmed, and therefore, the Trustee prays that this Honorable Court will:

- a. deny confirmation of the Debtors' Plan;
- b. dismiss or convert the Debtors' case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Douglas R. Roeder, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 24<sup>th</sup> day of February, 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Nicholas G. Platt, Esquire  
Mooney Law  
230 York Street  
Hanover, PA 17331

/s/Derek M. Stroupauer, Paralegal  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee